### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO.: 23-

v. : DATE FILED: September 14, 2023

OBASI TAHIR-LIGHTBOURNE : VIOLATIONS:

18 U.S.C. § 875(c) (interstate

: communication of threats - 5 counts) 18 U.S.C. § 2261A(2)(A) and (B)

: (cyberstalking – 1 count)

18 U.S.C. § 924(a)(1)(A) (making false

statements to federal firearms licensee -

1 count)

### **INDICTMENT**

### **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

On or about September 22, 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat to kill and injure L.B., transmitted in interstate commerce a communication, that is, an Instagram message to L.B., who is known to the grand jury, which read in part, "I will rape then blow your fucking head off, empty the 6 chambered shells I have then escape without a trace, I just want you to be very afraid of what's to come ..."

### **COUNT TWO**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about September 22, 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat to kill and injure L.B., transmitted in interstate commerce a communication, that is, Instagram messages to L.B., who is known to the grand jury, which contained an image of a revolver with bullets next to the revolver, and read in part, "Chambered with 6 hollow points I can't wait to blow your fucking head off. You won't see it coming. Ignore me all you want, your death will be even slower, don't go to sleep on Halloween night, I live right around the corner from you …"

### **COUNT THREE**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat to kill and injure L.B., transmitted in interstate commerce a communication, that is, Instagram messages to L.B., who is known to the grand jury, which read in part, "No matter where you hide I will find you, no matter where you run we will find you. You won't live to see 2021 ..."

### **COUNT FOUR**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 16, 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat to kill and injure L.B., transmitted in interstate commerce a communication, that is, Instagram messages to L.B., who is known to the grand jury, which read in part, "You're going to be drugged before you're raped also. You won't' see it coming and your family won't either ... Like I said the police won't save you..."

### **COUNT FIVE**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about October 16, 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat to kill and injure L.B., transmitted in interstate commerce a communication, that is, Instagram messages to L.B., who is known to the grand jury, which read in part, "I hope you were terrified completely you think this is a fucking joke, October 31, 2020 will be your last day to live ..."

### **COUNT SIX**

### THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 22, 2020 through on or about October 16,
 2020, in Delaware County, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **OBASI TAHIR-LIGHTBOURNE**

with the intent to harass and intimidate another person, that is, L.B., whose identity is known to the grand jury, used an interactive computer service, an electronic communication system, an electronic communication system of interstate commerce, and a facility of interstate commerce to engage in a course of conduct, described in paragraph 2 below, that placed L.B. in reasonable fear of death or serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to L.B.

- 2. Defendant TAHIR-LIGHTBOURNE's course of conduct included, among other things, the following, all conducted in a manner designed to hide defendant TAHIR-LIGHTBOURNE's true identity from L.B.:
- a. On or about September 22, 2020, defendant TAHIR-LIGHTBOURNE used Instagram account "tigertony1224" to send L.B. a series of messages to her Instagram account, which included the following:
- i. "I will rape then blow your fucking head off, empty the 6 chambered shells I have then escape without a trace, I just want you to be very afraid of what's to come ..."
- ii. An image of a revolver with bullets next to the revolver, and a message that read in part, "Chambered with 6 hollow points I can't wait to blow your

fucking head off. You won't see it coming. Ignore me all you want, your death will be even slower, don't go to sleep on Halloween night, I live right around the corner from you ..."

- iii. "I'll ask before we kill you what it feels like to die and where you will go"
- iv. "I'll put nails inside your mouth so if you bite you hurt yourself."
- b. On or about October 7, 2020, defendant TAHIR-LIGHTBOURNE used Instagram account "tigertony1224" to send L.B. a series of messages to her Instagram account, which included the following: "No matter where you hide I will find you, no matter where you run we will find you. You won't live to see 2021 ..."
- c. On or about October 16, 2020, defendant TAHIR-LIGHTBOURNE used Instagram account "tigertony1224" to send L.B. a series of messages to her Instagram account, which included the following:
- i. "You're going to be drugged before you're raped also. You won't' see it coming and your family won't either ... Like I said the police won't save you..."
- ii. "I hope you were terrified completely you think this is a fucking joke, October 31, 2020 will be your last day to live ..."
- iii. "You better accept this maybe responding can save you. We have a few request from you and we won't kill you."
- iv. "You have 11 days left before Halloween, we're still in California doxing you..."

In violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

### **COUNT SEVEN**

### THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

- Liberty Tactical Solutions, LLC, 1936 W. MacDade Boulevard, Woodlyn,
   PA, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
- FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44,
   Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
- 3. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 contains language warning that "making any false oral or written statement, or the exhibiting of any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony."
- 4. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth.

 On or about March 23, 2021, in Delaware County, in the Eastern District of Pennsylvania, defendant

### **OBASI TAHIR-LIGHTBOURNE**

in connection with the acquisition of a firearm, that is, a SCCY CPX2 9mm handgun, from FFL holder Liberty Tactical Solutions, LLC, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders' records, in that defendant TAHIR-LIGHTBOURNE certified on the Form 4473 that he had not been adjudicated as a mental defective or committed to a mental institution, and that he was not a fugitive from justice, when in fact, as defendant knew, that the statements were false and fictitious.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL:

GRAND JURY FUREPERSON

JACQUELINE C. ROMERO
United States Attornov

**United States Attorney** 

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No.

# UNITED STATES DISTRICT COURT

## Eastern District of Pennsylvania

### Criminal Division

# THE UNITED STATES OF AMERICA

VS.

## **OBASI TAHIR-LIGHTBOURNE**

### INDICTMENT

18 U.S.C. § 875(c) (interstate communication of threats - 5 counts)
18 U.S.C. § 2261A(2)(A) and (B) (cyberstalking – 1 count)
18 U.S.C. § 922(a)(1)(A) (making false statements to federal firearms licensee - 1 Counts

count)

